

EXHIBIT 2

In The Matter Of:

H. CRISTINA CHEN-OSTER; LISA PARISI, et al.

v.

GOLDMAN, SACHS & CO., et al.

CATHY OBRADOVICH - Vol. 1

April 18, 2012

MERRILL CORPORATION

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2 My next series of questions
3 will relate to, I'll call it the current
4 PeopleSoft Hewitt system just for ease of
5 reference. Okay?

6 A. Yes.

7 Q. For the current PeopleSoft
8 Hewitt system, are you generally familiar
9 with the reporting capability of that
10 system?

11 A. I am.

12 Q. And what is your knowledge?

13 A. It is a reporting tool called
14 Query Studio.

15 Q. And can you generally describe
16 Query Studio?

17 A. It is a tool that allows you
18 to select various data elements, drop and
19 drag those data elements into your report
20 parameters. Establish the time period
21 that you wish to pull the data, extract
22 the data from. And gives you the
23 capability to run the query and produce
24 the results.

25 Q. Was there any attempt to do

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2 system is a transactional system, it can
3 only give you a population at a certain
4 period of time. So in order to determine
5 the population that was requested, we
6 would have to write six queries just to
7 determine who is in this population.

8 Q. And by six queries, why is
9 that?

10 A. You have to do a query that
11 gives you the starting population, which
12 would be all of those employees active as
13 of September 2004. You would then have
14 to write a query for all the employees
15 who were active as of 12/31/2011. You
16 would then have to do another query for
17 all of the new hires hired during the
18 period 9/1/2004 through 12/31/2011. You
19 would have to write the next query on the
20 terminations during that same period.
21 You would also have to write a query on
22 transfers in. And then a query on
23 transfers out.

24 You would have to combine all
25 of that population to determine the

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2 requested population.

3 Q. And your answer to that
4 question relates to the functionality
5 available through the Query Studio; is
6 that right?

7 A. Correct.

8 Q. Are you familiar with any
9 other exporting functionality of the
10 Hewitt PeopleSoft system?

11 A. That's the only one that I'm
12 familiar with that we use in IT.

13 Q. And again, you've not
14 consulted with anybody at Hewitt about
15 this issue?

16 A. I have not.

17 Q. Nor have you consulted with a
18 PeopleSoft expert?

19 A. I have not.

20 Q. You mentioned in numbered
21 paragraph 6 something called a QC review.

22 Do you see that reference?

23 A. I do.

24 Q. What does that mean?

25 A. Quality control.

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2 Q. And what is quality control?

3 A. To ensure that the data that
4 the system has provided is accurate and
5 has maintained its integrity.

6 Q. And how would one determine
7 whether data is accurate and maintained
8 its accuracy?

9 A. We would review the data for
10 any missing data. We would look for
11 duplicate ID numbers. We would look for
12 things like duplicate entries.

13 Q. And is there a reason why you
14 would do a quality control review as part
15 of the data production?

16 A. It's our practice within our
17 team to always conduct a quality control
18 review before we provide any data to
19 anyone within the firm.

20 Q. And you believe that that
21 would take 40 to 80 hours to review for
22 accuracy and continuity of data?

23 A. For the amount of elements,
24 the number of elements that we're being
25 asked to provide, as yet that contributes

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2 that, I'll call it the old database for
3 ease of reference, match what we just
4 talked about, the use of the Query Studio
5 process?

6 A. It does not.

7 Q. Okay. How would that
8 information be extracted from the old
9 system?

10 A. In a much more difficult
11 manner.

12 Q. And what is that?

13 A. We would have to write SQL to
14 create the query. So we would not have
15 the drop and drag tool. That would
16 require a much further in-depth knowledge
17 of the data elements.

18 Q. Are you familiar with writing
19 scripts in SQL?

20 A. I don't write them, but I know
21 what that is, yes.

22 Q. And there are estimates on
23 numbered paragraph 9, et cetera.

24 Do you see those references?
25 So in particular, numbered paragraph 9,

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2 there is an estimate for 160 to 240
3 hours.

4 Do you see that reference?

5 A. 160 to 240, yes.

6 Q. And what would take 160 to 140
7 hours?

8 A. You would go through the same
9 process I previously described, to pull
10 the population, except you have to write
11 a SQL identifying the tables, the date
12 elements, and the logic to join the
13 information. So that's the first thing,
14 that takes approximately double the time
15 it would take to drop and drag.

16 Q. Writing the script in SQL
17 would take double the time?

18 A. Yes.

19 Q. Relative to Query Studio?

20 A. Correct.

21 Q. And what is the basis for that
22 statement?

23 A. The amount of information.
24 It's a blank screen. You have to type
25 every word of the language in to create

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2 the query. Whereas in Studio, you just
3 take the data element and move it to the
4 parameter location.

5 Q. Do you know how to program in
6 SQL?

7 A. Do I know how to program?

8 Q. Yes.

9 A. No.

10 Q. Did you speak to someone about
11 the time it would take to write in SQL?

12 A. Yes.

13 Q. Who is that?

14 A. Venkat.

15 Q. And Venkat told you it would
16 take 160 to 240 hours to write a SQL
17 script to respond to our request for 2002
18 to 2004 data?

19 A. That's not correct.

20 Q. How much time would it
21 physically take to write a script to
22 query the old PeopleSoft system? Before
23 you answer, there is a piece of paper in
24 front of you, I'm not sure what that is.
25 Is that something you're referring to?

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2 Q. And is that true of the cash
3 feed as well?

4 A. Correct.

5 Q. And again, remind me, what
6 information is recorded or recorded out
7 of total cost reconciliation?

8 A. It is the year end
9 compensation recommendation made by the
10 respective compensation managers of the
11 employee.

12 Q. Now, is that different than
13 what was actually paid to the employees
14 in terms of the amount of compensation?

15 A. It would be reflect the
16 total -- the per annum total compensation
17 for that particular employee.

18 Q. So that's what was actually
19 paid to the employee?

20 A. The per annum total
21 compensation is not the amount paid to
22 the employee, if the employee has not
23 worked at the firm for that entire year.

24 Q. With that exception, if you
25 had an employee that was employed for the

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2 full calendar year, would the total cost
3 reconciliation provide us the annualized
4 compensation for each employee?

5 MR. WEIRICH: Objection; vague
6 and ambiguous.

7 A. Can you re-ask that question?

8 Q. Sure. Putting aside partial
9 user employees, does the total cost
10 reconciliation file provide employee
11 compensation information?

12 A. It does provide employee
13 compensation information.

14 Q. And what is that information?

15 A. It has various elements of
16 compensation on it that sum into the per
17 annum total compensation.

18 Q. And if we were to take that
19 file and query it for the R code for the
20 divisions we're interested in and gender,
21 could that be done? In other words --
22 let me try it a different way.

23 If we wanted to use the total
24 cost reconciliation file to identify
25 putative class members and their

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2 MR. KLEIN: I think we're

3 done. Thank you.

4 (Time noted: 1:02 p.m.)

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7 _____

8 CATHY OBRADOVICH

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10 Subscribed and sworn to before me

11 this ____ day of _____, 2012.

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